

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:) Chapter 7
JASON L. WOEHLE,) Bankruptcy No. 18-12299
Debtor(s).) TRUSTEE’S REPLY TO RESPONSE
TO MOTION FOR TURNOVER

COMES NOW the duly appointed trustee, Nancy James, through counsel, The Livesey Law Firm, and Rory C. Livesey, and files this reply to the debtor’s Response to Motion for Turnover.

The debtor has expressed an interest in purchasing the estate’s equity in his residence located at 1920-A East Spruce Street, Seattle, Washington 98122 (“the Property”). A debtor doing so is not an uncommon scenario. To date, no firm proposal has been made. The debtor’s response is emblematic of how the debtor has approached the bankruptcy. The trustee made the first offer to sell the equity in early February. As in his response, the debtor has been saying he has a friend who will loan him the money. Apparently that opportunity is no longer available. However, he does not provide any sort of alternative or a timeline by which he hopes to make a real offer.

The debtor has had nearly five months to make a proposal to the trustee to purchase the equity in his residence. The trustee needs to begin marketing the Property. Access to the Property has been difficult. Given the delays caused by the debtor, entering an order requiring the debtor to turn the Property over to the trustee is appropriate. The debtor can still make a proposal to purchase the equity. However, at this point the trustee must move to liquidate this asset. The trustee requests

1 that the objection be overruled and the court enter the order directing the debtor to turn over the
2 Property.

3 RESPECTFULLY SUBMITTED this 25th day of June, 2019.

4 THE LIVESEY LAW FIRM

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6 */S/ Rory C. Livesey*

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Rory C. Livesey, WSBA #17601
8 Attorney for Trustee
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